

**From:** [Brian Chenoweth](#)  
**To:** [John weyrauch](#); [Andrea Meyer](#); [Norma Arhos](#)  
**Cc:** [Annicca Jones](#); [Klaus H. Hamm](#); [Peter Forrest](#)  
**Subject:** RE: Quaiz v. Rockler Retail Group, Inc, et al  
**Date:** Friday, January 20, 2017 4:12:36 PM

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Hi, John. As I understand where we are, you will not stipulate to a discovery plan. You have not provided any reason as to why you will not stipulate to the discovery plan we proposed. We will inform the court accordingly, and we can address it at the Rule 16 conference. As to our attempt to have you agree to a stipulated discovery plan, it is not the appropriate vehicle for your client advocacy, which is why we objected to the language you have tried to insert (to a motion you will not join in). The cases you cite are not on point, and we don't agree that you cannot determine what we are claiming are the trade secrets with reasonable particularity. You are certainly able to follow in deposition or interrogatories if you have more questions, but I don't think there is any reasonable basis for you to say you cannot respond to our request for documents. Again, we can address this with the court, but not in what is supposed to be a stipulated discovery plan.

Have a good weekend, all.

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**From:** John weyrauch [mailto:[jmweyrauch@dbclaw.com](mailto:jmweyrauch@dbclaw.com)]  
**Sent:** Thursday, January 19, 2017 8:39 AM  
**To:** Brian Chenoweth; Andrea Meyer; Norma Arhos  
**Cc:** Annicca Jones; Klaus H. Hamm; Peter Forrest  
**Subject:** RE: Quaiz v. Rockler Retail Group, Inc, et al

Brian: Please review this alternative edit to the 26(f) report. Thank you.

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